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**FILED
HARRISBURG**

JUL 10 2001

MARY E. D'ANDREA, CLERK
Per [Signature]
DEPUTY CLERK

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**GRAHAM ARCHITECTURAL
PRODUCTS CORP.,**

Plaintiff,

STAR INSURANCE COMPANY,

Defendant.

Civil Action No. 1:CV-00-1140
Judge William W. Caldwell _____

**SECOND STIPULATED MOTION TO
EXTEND TIME FOR DISCOVERY AND
MODIFY SECOND AMENDED CASE
MANAGEMENT ORDER**

Plaintiff, Graham Architectural Products Corp. ("Graham"), by and through its undersigned counsel, files the following Second Stipulated Motion To Extend Time For Discovery And Modify the Second Amended Case Management Order, and states as follows:

1. On April 19, 2001, this Court issued its Second Amended Case Management Order, a true and correct copy of which is attached hereto as Exhibit "A".
2. Under the terms of the Second Amended Case Management Order, the parties are to complete all discovery on or before July 15, 2001.
3. On or about June 8, 2001, Star served Interrogatories, Request for Production of Documents and Requests for Admissions upon Graham.

4. Graham's Answers to Star's Interrogatories, Requests for Production and Requests for Admissions are due on July 11, 2001.

5. In addition to the written discovery propounded by Star, Star has noticed the deposition of Graham's Corporate Designee to occur on July 13, 2001.

6. Since the date this matter was last before the Court, Graham has had extensive discussions with the owner of the project, the Detroit Public School System, in an effort to resolve the disputes between the parties.

7. Because counsel for Graham believes that there is a substantial likelihood that is claims against Star may be resolved through its continued discussions with the Project Owner, Graham does not believe it is in the best interest of the parties to adhere to the discovery deadline imposed by the Second Amended Case Management Order when a resolution of this matter may be reached shortly.

8. Star's counsel has advised that it will consent to an extension of time for Graham to respond to its written discovery and has agreed to continue the deposition of Graham's Corporate Designee until a later date, provided that this Court grants the within Second Stipulated Motion to Extend Time for Discovery and Modify Second Amended Case Management Order.

9. Graham requests that discovery be extended to December 15, 2001.

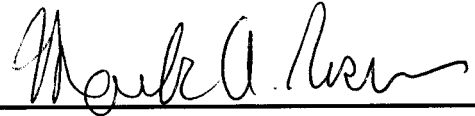
10. Graham is confident that every effort to resolve this matter without further litigation can be completed within this timeframe.

11. Graham further requests that the other deadlines set forth in the Second Amended Case Management Order be extended as set forth in the proposed Third Amended Case Management Order submitted with this motion.

WHEREFORE, Plaintiff, Graham Architectural Products Corp., respectfully requests that the Court extend the time for discovery up to and including December 15, 2001, and that the Court extend the other deadlines as set forth in the proposed Third Amended Case Management Order.


Respectfully submitted,

McELROY, DEUTSCH & MULVANEY, LLP
Attorneys for Plaintiff,
Graham Architectural Products Corp.

By: 
Mark A. Rosen

STIPULATED TO:

BLUMLING & GUSKY, LLP


Michael D. Klein, Esquire
Pa. I.D. No76212
Counsel for Defendant,
Star Insurance Company

Dated: July 9th, 2001

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FILED
HARRISBURG, PA

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MARY E. D'ANDREA, CLERK
PER DEPUTY CLERK

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

GRAHAM ARCHITECTURAL
PRODUCTS CORP.,

Plaintiff,

v.

STAR INSURANCE COMPANY,

Defendant.

Civil Action No. 1:CV-00-1140
Judge William W. Caldwell

SECOND AMENDED CASE
MANAGEMENT ORDER

AND NOW, this 19th day of April, 2001, it is hereby Ordered,
Adjudged and Decreed that the March 13, 2001, Amended Case Management Order is hereby
VACATED;

IT IS FURTHER ORDERED, that the Second Amended Case Management Order shall
be as follows:

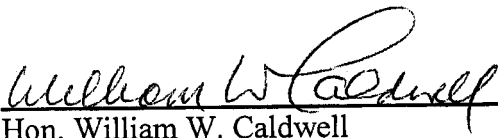
A. Discovery shall be suspended until this Court issues its Order concerning
Defendant's Motion for Leave to File Supplemental Answer and Affirmative Defenses.

B. Discovery shall be completed sixty (60) days from the date on which this Court
issues its Order concerning Defendant's Motion for Leave to File Supplemental Answer And
Affirmative Defenses. Plaintiff's expert witness report is due seventy five (75) days from the
date on which this Court issues its Order concerning Defendant's Motion for Leave to File

Supplemental Answer And Affirmative Defenses. Defendant's expert witness report is due ninety (90) days from the date on which this Court issues its Order concerning Defendant's Motion for Leave to File Supplemental Answer And Affirmative Defenses.

C. All pre-trial motions shall be filed seventy (70) days from the date on which this Court issues its Order concerning Defendant's Motion for Leave to File Supplemental Answer And Affirmative Defenses. All pre-trial motions shall be accompanied by a supporting Brief which shall comply with local Rule 7.8 and paragraph IV of the Scheduling Order previously entered in this Court.

D. This case shall be put on the December, 2001 trial list of this Court. The parties and known witnesses shall be notified of the schedule immediately, or as soon as identified as such.


Hon. William W. Caldwell
United States District Judge

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**GRAHAM ARCHITECTURAL
PRODUCTS CORP.,**

Plaintiff,

v.

STAR INSURANCE COMPANY,

Defendant.

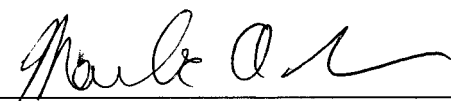
**Civil Action No. 1:CV-00-1140
Judge William W. Caldwell**

CERTIFICATE OF CONCURRENCE

I, Mark A. Rosen, counsel for Plaintiff, Graham Architectural Products Corp., do hereby certify pursuant to Local Rule 7.1 of the Federal Rules of Civil Procedure for the Middle District of Pennsylvania that Michael D. Klein, counsel for Defendant, Star Insurance Company, was contacted for the purpose of seeking concurrence to file Plaintiff's Stipulated Motion To Extend Time For Discovery And Modify Amended Case Management Order, and that such concurrence was granted.

Respectfully submitted,

McELROY, DEUTSCH & MULVANEY, LLP
Attorneys for Plaintiff
Graham Architectural Products Corp.

By: 
Mark A. Rosen

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**GRAHAM ARCHITECTURAL
PRODUCTS CORP.,**

Plaintiff,

v.

STAR INSURANCE COMPANY,

Defendant.

Civil Action No. 1:CV-00-1140

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Second Stipulated Motion to Extend Time for Discovery and Modify Second Amended Case Management Order was served this 9th day of July, 2001, upon the following by depositing the same in the United States mail, first class, postage pre-paid:

Michael D. Klein, Esq.
Blumling & Gusky, LLP
1200 Koppers Building
Pittsburgh, Pennsylvania 15219